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Application granted. The parties' time to file an application to restore the action is

The Clerk of Court is respectfully directed to

extended to October 22, 2025.

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201-355-3440 Direct Telephone Javier L. Merino, Esq. JMerino@DannLaw.com Email

terminate the letter motion pending at Doc.

July 15, 2025

SO ORDERED.

Via ECF

Hon. Philip M. Halpern, U.S.D.J.

The Hon. Charles L. Brieant Jr. Federal Building and Cour 300 Quarropas St.

White Plains, NY 10601-4150

Philip M. Halpern

United States District Judge

Dated: White Plains, New York July 15, 2025

Re:

Wolf, et al. v. Dolgen New York, LLC

Case No.: 7:23-cv-00558-PMH

Dear Judge Halpern:

Plaintiffs Joseph Wolf, Carmen Wolf, and the putative class (collectively, the "Wolfs"), and Defendant Dolgen New York, LLC ("Dollar General", the parties collectively, the "Parties"), through their undersigned counsel, submit this joint letter motion to request the Court stay the case for an additional ninety (90) days, to October 22, 2025. On April 25, 2025, the Court granted the Parties' request to stay the Case based on the Parties anticipating that a motion for preliminary approval would be decided within 90 days of the letter by the Superior Court of New Jersey. [D.E. 103]. On May 19, 2025, the Wolfs provided Dollar General with an initial draft of the settlement agreement, and Dollar General has provided proposed edits and feedback on the draft. In addition, both sides have engaged in discussions with possible settlement administrators. The Parties hope to finalize the settlement agreement within the next thirty (30) to forty-five (45) days.

In light of the above, the Parties are confident that an additional ninety (90) day stay will provide sufficient time for them to report back to this Court with a decision on preliminary approval of the class action settlement.

Respectfully submitted,

THE DANN LAW FIRM, PC

McGuireWoods LLP

/s/ Philip A. Goldstein

/s/ Javier L. Merino Javier L. Merino, Esq.

Javier L. Merino, Esq.

s C

Philip A. Goldstein, Esq.

Counsel for Plaintiffs and the Putative Class

Counsel for Defendant Dolgen New York, LLC